

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

December 29th 2011
WILLIAM M. McCOOL, Clerk
By R. Reatham Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

GURJIT SINGH SANDHU,
NARMINDER KALER,
JASMIN KLAIR,

Defendants.

CASE NO.

CR 11 422-JLR

INDICTMENT

The Grand Jury charges:

COUNT ONE
(Conspiracy to Distribute Cocaine)

Beginning at a time unknown, but within the last five years, and continuing through on or about December 15, 2011, at Blaine, within the Western District of Washington and elsewhere, GURJIT SINGH SANDHU, NARMINDER KALER, and JASMIN KLAIR, and others known and unknown, did knowingly and intentionally conspire to distribute cocaine, a substance controlled under Schedule II, Title 21, United States Code, Section 812.

The grand jury further alleges that the offense involved five kilograms or more of a mixture or substance containing a detectable amount of cocaine.

1 All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A),
2 and 846.

3
4 **COUNT TWO**
(Possession with Intent to Distribute Cocaine)

5 On or about December 15, 2011, at Blaine, within the Western District of
6 Washington and elsewhere, JASMIN KLAIR, and others known and unknown, did
7 knowingly and intentionally, and with the intent to distribute, possess cocaine, a
8 substance controlled under Schedule II, Title 21, United States Code, Section 812.

9 The grand jury further alleges that the offense involved five kilograms or more of a
10 mixture or substance containing a detectable amount of cocaine.

11 The grand jury further alleges that this offense was committed in furtherance of the
12 conspiracy to distribute cocaine alleged in Count One, above.

13 All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).
14

15 **COUNT THREE**
(Attempted Possession with Intent to Distribute Cocaine)

16 On or about December 15, 2011, at Blaine, within the Western District of
17 Washington and elsewhere, GURJIT SINGH SANDU and NARMINDER KALER, and
18 others known and unknown, did knowingly and intentionally, and with the intent to
19 distribute, attempt to possess, and aid and abet the attempted possession of, cocaine, a
20 substance controlled under Schedule II, Title 21, United States Code, Section 812.

21 The grand jury further alleges that the offense involved five kilograms or more of a
22 mixture or substance containing a detectable amount of cocaine.

23 The grand jury further alleges that this offense was committed in furtherance of the
24 conspiracy to distribute cocaine alleged in Count One, above.

25 All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A),
26 and 846, and Title 18, United States Code, Section 2.
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28

FORFEITURE ALLEGATIONS

Pursuant to Title 21, United States Code, Section 853, upon conviction of any of the felony drug offenses charged in Counts One through Three, Defendants GURJIT SINGH SANDU, NARMINDER KALER, and JASMIN KLAIR shall forfeit to the United States any and all property, real or personal, constituting, or derived from, any proceeds the Defendants obtained, directly or indirectly, as the result of said criminal offenses, and shall further forfeit and any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such criminal offenses, including, but not limited to, a sum of money in United States currency, equal to and representing the amount of proceeds obtained as a result of and during the life of the conspiracy charged in Count One, above.

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SUBSTITUTE ASSETS

If any of the above-described forfeitable property, as a result of any act or omission of the Defendants –

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

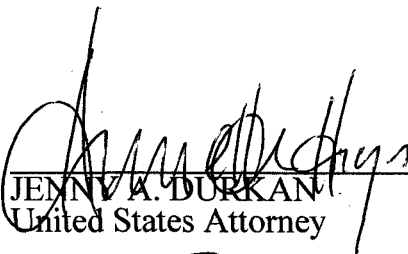
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek the forfeiture of any other property of the Defendants up to the value of the above-described forfeitable properties.

A TRUE BILL:

DATED: 12/29/2011

Signature of Foreperson redacted
pursuant to the policy of the Judicial
Conference of the United States

FOREPERSON



JENNY A. DURKAN
United States Attorney



SARAH VOGEL
Assistant United States Attorney



JERROD C. PATTERSON
Assistant United States Attorney